

NO. 47356-9

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**COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON**

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BRAD GOODSPEED,

Appellant,

v.

WASHINGTON STATE DEPARTMENT OF SOCIAL & HEALTH  
SERVICES,

Respondent.

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**DEPARTMENT OF SOCIAL AND HEALTH SERVICES'S BRIEF**

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## **I. INTRODUCTION**

Olga Rodriguez and Brad Goodspeed are the parents of H.G. Ms. Rodriguez, as H.G.'s custodial parent, requested child support services from the Department of Social and Health Services (Department).

Following a proceeding in front of an Administrative Law Judge (ALJ), a remand by the superior court, and a second administrative hearing, the ALJ issued the final order that is before this Court on appeal. That order establishes a child support obligation that Mr. Goodspeed is required to pay. The ALJ arrived at the amount of the obligation using the child support schedule, as informed by the actual income of Ms. Rodriguez and by imputing income to Mr. Goodspeed.

Mr. Goodspeed contests the imputation of income. Since neither parent receives public assistance, the Department's interest on appeal is limited to preserving the forum that it provides for private parties to establish child support obligations. Therefore, the purpose of this brief is to inform the Court of the procedural history, relevant facts, and legal standards. The Department takes no position on whether the facts should result in affirmance or reversal of the ALJ's order.

## **II. COUNTERSTATEMENT OF THE ISSUES<sup>1</sup>**

Whether the final order's imputation of income to Mr. Goodspeed is supported by substantial evidence or is arbitrary and capricious.

## **III. STATEMENT OF THE CASE**

### **A. Administrative Establishment of Child Support**

A parent who is not receiving public assistance may request that the Department of Social and Health Services's Division of Child Support establish and enforce the other parent's child support obligation.<sup>2</sup> RCW 74.04.020(2); WAC 388-14A-2000(2)(a). When child support is established administratively, the Division of Child Support applies the same statewide child support schedule as the courts. *See* RCW 26.19.001; WAC 388-14A-3200.

Child support is calculated based on the combined monthly incomes of both parents. RCW 26.19.020; RCW 26.19.071(1). The child support schedule allocates each parent's obligation based on his or her share of the combined monthly income. RCW 26.19.080(1). Parents are required to verify income and deductions by providing tax returns from the preceding two years and current paystubs; income not appearing on tax

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<sup>1</sup> The Department does not intend to expand or limit the scope of review of Mr. Goodspeed's appeal; this articulation represents the Department's understanding of the issues raised by Mr. Goodspeed using the language and standards of the Administrative Procedure Act.

<sup>2</sup> By contrast, the Department is required to establish child support when the custodial parent is receiving public assistance. RCW 74.04.020(1); WAC 388-14A-2005.

returns and pay stubs must be verified by “other sufficient verification.” RCW 26.19.071(2). All income sources are included in gross monthly income unless specifically excluded. RCW 26.19.071(3).

Although the same statewide child support schedule applies in both the judicial and administrative forums, the administrative process for setting child support differs from the judicial one. Under the administrative process, the Division of Child Support issues a support establishment notice, which is either a notice and finding of financial responsibility or a notice and finding of parental responsibility, depending on whether paternity is at issue. WAC 388-14A-3100(4); *see also* RCW 74.20A.055. This notice is served on the noncustodial and custodial parents and sets forth the amount that the noncustodial parent owes. RCW 74.20A.055; WAC 388-14A-3105, -3115(4)(a).

Either parent may object to the notice and finding of financial responsibility by requesting a hearing. WAC 388-14A-3110. The Division of Child Support submits the hearing request to the Office of Administrative Hearings, and an ALJ presides over the hearing. WAC 388-14A-3130(2), (4). The parents must appear and show cause why the amount in the notice is incorrect, but the noncustodial parent has the burden of proving any defenses to liability. RCW 74.20A.055(1); WAC 388-14A-3115(15).



If both parents appear at the hearing, the ALJ enters an order setting a child support obligation. WAC 388-14A-3133(2). That obligation may be “higher or lower, or different from, the terms” of the Division of Child Support’s notice and finding of financial responsibility. *Id.* If neither parent attends the hearing, the ALJ enters a default order and the notice and finding of financial responsibility becomes final. WAC 388-14A-3131(1). If only one parent attends the hearing, the ALJ enters a default order against the parent that did not appear. WAC 388-14A-3132(1).

The Division of Child Support’s role at the hearing is defined by statute. The division’s representative is directed to “[m]ake independent recommendations to ensure the integrity and proper application of the law and process.” RCW 74.20.057(4); *see also* WAC 388-14A-3133(3). However, the representative “does not act on behalf of or as an agent or representative of an individual.” RCW 74.20.057.

The ALJ’s order setting the child support obligation is a final order.<sup>3</sup> WAC 388-14A-6115(1). No administrative review by the Department is available. WAC 388-14A-6120(1). Either parent may petition for judicial review under the Administrative Procedure Act, chapter 34.50 RCW; the Division of Child Support may not. WAC 388-14A-6120(6).

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<sup>3</sup> Prior to 2002, the ALJ’s order was an initial order that could be reviewed by a review judge of the Department of Social and Health Services. WAC 388-14A-6110.

**B. Role of the Attorney General's Office**

In child support actions, the Attorney General represents “the state, the best interests of the child relating to parentage, and the best interests of the children of the state, but does not represent the interests of any other individual.” RCW 74.20.220(4). The Office of the Attorney General does not represent either parent. *Id.* Because no public assistance has been expended for the support of H.G., and the State has no direct financial interest in the outcome of this case, *see* WAC 388-14A-2030(2), the State’s role is limited. The dispute is between the parents, and the State is, in effect, a nominal party.

**C. Factual Overview**

Olga Rodriguez and Brad Goodspeed are the parents of H.G. Administrative Record (AR) at 3A. Ms. Rodriguez, the custodial parent, applied to the Division of Child Support for child support services. *Id.* at 3A; Clerk’s Papers (CP) at 207. The Division of Child Support issued a Notice and Finding of Financial Responsibility, and Mr. Goodspeed requested a hearing. AR at 199A-216A.

Following a hearing on April 16, 2012, the ALJ issued the first order. In the first order, the ALJ based Mr. Goodspeed’s child support obligation on imputed median net income as calculated by the Census

Bureau for males in Mr. Goodspeed's age bracket. AR at 181A. Mr. Goodspeed filed a petition for judicial review. *Id.* at 26A.

The superior court reversed the first order and remanded the matter to the ALJ. The reversal was based on the court's conclusion that concluded that the first order did not contain adequately detailed findings supporting the imputation of income. CP at 166. The court further opined that "[p]arental income can be based on median net income when parental financial records are incomplete or sporadic if there has been deception by one of the parents." *Id.* (citing *In re Marriage of Dodd*, 120 Wn. App. 638, 86 P.3d 801 (2004)); *In re Marriage of Didier*, 134 Wn. App. 490, 140 P.3d 607 (2006)).

After the ALJ's first order was reversed by the superior court, AR at 26A-29A, the ALJ held a new evidentiary hearing and issued the Final Order Re Remand (Final Order). In the Final Order, the ALJ ordered Mr. Goodspeed to pay \$706.45 per month, after assigning Mr. Goodspeed 53.6% of the support obligation and Ms. Rodriguez the remaining 46.4%. *Id.* at 12A. The ALJ established Ms. Rodriguez's income by relying on a 2011 W-2 form filed by her employer with the Internal Revenue Service. *Id.* at 10A. As in her first order, the ALJ established Mr. Goodspeed's income by imputing to him the median net monthly income for males aged 55-64 from the United States Census Bureau. *Id.* at 10A, 12A-13A, 15A.

Unlike the first order, the Final Order contained additional findings. E.g., AR at 13A. Mr. Goodspeed again filed a petition for review challenging the calculation of his income. CP at 11. The superior court affirmed the Final Order, which is now before this Court for review. *Id.* at 1A-25A.

**D. Findings and Facts Related to the Imputation of Mr. Goodspeed's Income**

The underlying issue on review is the ALJ's imputation of net income to Mr. Goodspeed in the amount of \$3,735.00 per month. AR at 13A. Mr. Goodspeed has been self-employed since 1977, VRP (June 3, 2013) at 58:24—59:1, and has been involved with multiple businesses over that time. The following is an overview of the evidence presented regarding those business activities and the income generated. The Department takes no position as to the truth or completeness of these facts, as most came from Mr. Goodspeed's testimony, which the ALJ found to be not credible, AR at 11A.

**1. Mr. Goodspeed's Business Activities**

From 1977 through the 1980s, Mr. Goodspeed was involved in construction and land development. VRP (June 3, 2013) at 59:2-8. In the 1990s, Mr. Goodspeed built homes, streets, and improvements, and operated a cement plant. *Id.* at 59:9-10. From the late 1990s through the

mid-2000s, he remodeled a commercial warehouse. *Id.* at 59:11-13, 59:19-25.

In 2004, Mr. Goodspeed entered into a consulting agreement with **Radix Marine**. VRP (June 3, 2013) at 32:22-25. Radix Marine was a publicly-traded company that submitted bids to build military and drug interdiction patrol craft and, in the event an order was placed, would have contracted the construction work out to another company. VRP (April 16, 2012) at 34:16-18, 40:2-3; VRP (June 3, 2013) at 44:25-45:2. Mr. Goodspeed submitted bids, requests for quotes, and requests for bids on behalf of Radix Marine. *Id.* at 45:12-15. At the time of the 2012 hearing the president of Radix Marine was Fred Lartz, who was Mr. Goodspeed's friend and roommate. VRP (April 16, 2012) at 31:14-15, 49:9-21; AR at 117A. Mr. Goodspeed and Mr. Lartz were the only two people who worked for Radix Marine. VRP (June 3, 2013) at 46:5-9.

Also in 2004, Mr. Goodspeed began doing consulting work for the **Noland Decoto** flying service in Yakima. *Id.* at 60:3-4. In 2008, Mr. Goodspeed purchased Noland Decoto's Yakima property through **M.A. West Rockies**, a company in which Mr. Goodspeed had a 100 percent ownership interest. *Id.* at 60:19-20; VRP (April 16, 2012) at 39:16-18. M.A. West Rockies continued Noland Decoto's business operations at McAllister Air Field in Yakima, allowing privately owned

planes to access the airport from adjacent property. AR at 123A-124A. This was M.A. West Rockies doing business as “Noland Decoto.” VRP (April 16, 2012) at 50:8-11. This continued until 2010 or 2011, when the airport terminated M.A. West Rockies’s lease, and M.A. West Rockies transferred the property to the lender (hereinafter “Noland Decoto lender”) by deed in lieu of foreclosure. VRP (June 3, 2013) at 60:22-24, 61:4-6.

M.A. West Rockies was dissolved in 2011. AR at 112A. Mr. Goodspeed continued to manage the Noland Decoto property for the Noland Decoto lender. VRP (June 3, 2013) at 56:15-16, 61:11-16. He also continued to operate his limousine service as a sole proprietor and provide wine tours. AR at 106A.

Beginning in March 2012, Mr. Goodspeed provided consulting services to **Blue Ribbon Holdings**. VRP (June 3, 2012) at 36:20-24. Blue Ribbon Holdings is a limited liability company owned by Mr. Goodspeed’s two daughters who resided with him, ages 17 and 21 at the time of the April 2012 hearing. *Id.* at 41:3-4; VRP (April 16, 2012) at 41:5-13. It operated a flight training and aircraft rental business at Boeing Field with aircraft leased from BKG Holdings, which was also owned by Mr. Goodspeed’s two daughters. VRP (June 3, 2012) at 48:23-24, 49:7-15.

## **2. Evidence of Mr. Goodspeed's Actual Income**

The record contains documentary evidence about Mr. Goodspeed's income that was submitted by Mr. Goodspeed. Mr. Goodspeed submitted his 2010 IRS Individual Income Tax Return 1040 form, which was signed on April 1, 2012. AR at 39A-44A. That form reports \$0 in wages, salaries, or tips, business income of \$11,161.96, and an adjusted gross income of \$10,828.30. *Id.* at 39A. Mr. Goodspeed also submitted his 2011 IRS Individual Income Tax Return 1040 form, which was signed on April 18, 2012. *Id.* at 47A-52A. That form reports \$0 in wages, salaries, or tips, business income of \$17,069.67, and an adjusted gross income of \$15,863.86. *Id.* at 47A. Prior to 2012, Mr. Goodspeed had not filed federal income tax returns. *Id.* at 88A; VRP (April 16, 2012) at 21:25-22:1.

Mr. Goodspeed also provided other documents regarding his income. In a January 30, 2012 declaration he stated that he makes "between 1800-2500 a month driving the limos . . . and working as a property manager on the property in Yakima." AR at 58A, 62A. On January 29, 2012, Mr. Goodspeed completed a Statement of Resources and Expenses in which he reported net annual business income of \$20,000 to \$25,000. *Id.* at 219A-225A.

Mr. Goodspeed also submitted his checking account records from February 29, 2012, through May 6, 2013. *Id.* at 229A-287A. He testified

that this is his only checking account and that he uses it for his limousine business. VRP (June 3, 2013) at 51:1-6. Those records reflect credits (i.e., deposits) totaling \$147,882.14. *See* AR at 229A-287A. The following chart shows the total deposits by month:

<b>Month</b>	<b>Amount of Deposits</b>
February 2012	\$11,623.99
March 2012	\$44,222.98
April 2012	\$29,842.07
May 2012	\$22,299.25
June 2012	\$13,045.13
July 2012	\$9,428.25 <sup>4</sup>
August 2012	\$5,762.46
September 2012	\$4,693.75
October 2012 <sup>5</sup>	\$2,997.10
November 2012	\$1,746.75
December 2012	\$472.90
January 2013	\$662.00
February 2013	\$255.51
March 2013	\$120.00
April 2013	\$20.00
May 2013	\$690.00

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<sup>4</sup> The Department's totals differ from the ALJ's calculations for July 2012 (by \$1,233.01), August 2012 (by \$90.75), September 2012 (by \$0.50), and October 2012 (by \$10.00). *See* AR at 8A. The ALJ did not calculate totals for December 2012 through May 2013. *See id.* at 9A.

<sup>5</sup> For the months after September 2012, the checking account records reflect dramatically fewer transactions (debits or credits). *See, e.g., id.* at 285A (three transactions in April 2013).



*See id.* A cover letter accompanying Mr. Goodspeed's checking account records stated that "[t]he first several months there were many repayments for material purchased in Yakima from the property owner and fuel purchases at Aeroflight. They were repayments of expenses and not income. You will see associated checks and purchases that offset to Aeroflight and Home Depot etc with debit card." AR at 228A (capitalization altered).

Mr. Goodspeed also provided oral testimony about his income in both the April 16, 2012, and June 23, 2013 hearings before the ALJ. Mr. Goodspeed testified to the following past and present income:

- **Sole Proprietorship:** This reflects present income. Mr. Goodspeed testified that he earns "between \$800 and \$1,200 a month," including tips, doing wine tours with two limousines. *Id.* at 37:18-38:3. This was based on his charging \$270.20 for a five-hour tour with tips averaging between \$20 to \$80 per trip. VRP (June 3, 2013) at 55:1-3. Mr. Goodspeed testified that, as of June 3, 2013, he had three trips scheduled for June and one trip scheduled for the month of July and one more scheduled for the month of August. *Id.*

at 55:14-17. The record does not reflect how many wine tours he had conducted in the months before the hearing.<sup>6</sup>

- **Blue Ribbon Holdings:** This reflects present income. Mr. Goodspeed receives gas expenses and either \$100 or \$500 per travel day, depending on the subject matter of the trip. VRP (June 3, 2013) at 35:22-24. He typically has one travel day per week. *Id.* at 36:2-19. The record does not reflect the percentage of trips that were reimbursed at \$100 versus \$500. This represents typical income (excluding reimbursement for gas expenses) of \$430 to \$2,150 per month.<sup>7</sup>
- **Noland Decoto Lender:** This information reflects both past and present income. The past income is reflected in Mr. Goodspeed's testimony at the April 16, 2012 hearing that he received \$1,000 to \$1,200 in compensation, as well as payment of his cell phone bill, for taking care of the Noland Decoto property on behalf of the lender. VRP (April 16, 2012) at 36:11-37:15; 44:6-7. The present income is reflected in Mr. Goodspeed's testimony in the June 3,

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<sup>6</sup> The checking account records for the month of September 2012 contain five deposits between \$270 and \$350, which would be within the range of a \$270 limousine trip and a tip between \$0 and \$80. AR at 272A-275A. The checking account records are largely unexplained in the record.

<sup>7</sup> This is based on an average of 4.3 weeks in a month. The calculations are as follows: \$100/week x 4.3 weeks/month = \$430/month; \$500/week x 4.3 weeks/month = \$2,150/month.

2013 hearing that he receives free rent, which he values at \$800 to \$900 per month, from the Noland Decoto lender, but that he is not receiving cash. VRP (June 3, 2013) at 56:15-23, 63:22-23, 66:25-67:5; *see also* WAC 388-14A-1020 (definitions of “income” and “earnings”).

- **Noland Decoto:** This information reflects only past income. Prior to 2008, he received a mortgage interest in Noland Decoto’s Yakima property (which he later purchased through M.A. West Rockies) and earned about \$2,500 per month. VRP (April 16, 2012) at 39:6-18; VRP (June 3, 2013) at 19-22. Between 2008 and 2011, Mr. Goodspeed made approximately \$2,800 to \$3,000 per month from the Noland Decoto air activities of M.A. West Rockies. VRP (June 3, 2013) at 61:17-20.
- **Radix Marine:** This information reflects past income for ongoing work. In 2007, Mr. Goodspeed received six million shares in Radix Marine for work that continued through at least June 3, 2013. VRP (June 3, 2013) at 32:22-35:8. Mr. Goodspeed estimated the value of his consulting work for Radix Marine at \$150 per day. *Id.* at 47:25-48:5.
- **Marquis Development:** This reflects only past income. Mr. Goodspeed had a 30 percent interest in Marquis Development

in addition to receiving payment of between \$500 and \$1,000 per month. VRP (April 16, 2012) at 40:23-41:7. Mr. Goodspeed testified that the company had dissolved in 2011. *Id.* at 41:1-2.

### **3. The ALJ's Findings Regarding Evidence of Mr. Goodspeed's Actual Income**

The final order found that “Mr. Goodspeed’s testimony and evidence regarding his income . . . lacks any credibility.” AR at 11A.

The ALJ found that the 2010 and 2011 individual tax returns “were prepared primarily in preparation for the hearing to establish [his] child support obligation” and, therefore, that they “are not a reliable representation of [his] actual earnings.” *Id.* The final order noted that the 2010 and 2011 tax returns were dated April 1, 2012, and April 18, 2012 respectively, both of which were in close proximity to the child support hearing scheduled for April 16, 2012. *Id.* at 7A.

The final order also addressed Mr. Goodspeed’s bank records. The ALJ found that the bank records that Mr. Goodspeed had submitted “are not consistent with Mr. Goodspeed’s reported earning[s] for the two year[] period,” and specifically noted that the deposits to Mr. Goodspeed’s checking account over the period from February 2012 through November 2012 averaged over \$14,000 per month. *Id.* at 11A.

Regarding Mr. Goodspeed's testimony, the ALJ found that, "[t]hroughout the hearing, Mr. Goodspeed was vague and evasive regarding his interests in various entities and his actual income. He attempted to paint a dire picture of his finances. Mr. Goodspeed clearly wanted to minimize the amount of his monetary obligation to support his daughter." *Id.* The final order further found that, "[f]or each source of income, it is not possible to determine with any degree of certainty[] what Mr. Goodspeed's income actually is. Only Mr. Goodspeed has this knowledge. He has been less than forthright about what his income actually is." *Id.* at 6A. As a result, the ALJ concluded in the final order that "[i]t is impossible to determine Mr. Goodspeed's true earnings." AR at 9A.

#### **4. Evidence of Mr. Goodspeed's Health, Age, and Other Factors**

In addition to the work history described above, the record contains additional information about Mr. Goodspeed that is related to the factors concerning imputation of income. *See* RCW 26.19.071(6). Mr. Goodspeed is a high school graduate and a trained pilot who flies planes with up to five passengers. VRP (April 16, 2012) at 32-33. He has high blood pressure related to excess weight, which prevented him from flying planes as of the April 16, 2012 hearing. *Id.* at 31:3-4, 33:6-12. He is

otherwise in good health. *Id.* at 31:1-4. Mr. Goodspeed testified that he works 50 hours per week and has been self-employed for 35 years. *Id.* at 33:18; VRP (June 3, 3013) at 56:9.

### **5. Findings Regarding Voluntary Underemployment**

The final order addressed Mr. Goodspeed's work history, education, health, and age in determining whether he is voluntarily underemployed. AR at 4A-7A. Based on these considerations, the ALJ concluded that "Mr. Goodspeed is voluntarily underemployed for the purpose of reducing his child support obligation." AR at 13A.

Based on her findings that Mr. Goodspeed was voluntarily underemployed to reduce his child support obligation, the ALJ concluded that imputation of income was appropriate. *Id.* The ALJ then addressed each of the methods of imputing income under RCW 26.19.071(6), concluding that the only appropriate way to impute income was to use the median net monthly income of year-round full-time workers as described in RCW 26.19.071(6)(e). *Id.* Specifically, the final order stated that "[d]ue to the nature of his business transactions it is impossible to determine[] Mr. Goodspeed's full time earnings at a current rate of pay" or "on a historical full time rate of pay based on reliable information" or "at a past rate of pay where information is incomplete or sporadic." *Id.* The ALJ also concluded that Mr. Goodspeed's "age, health, education, and work

experience suggest an ability to earn far more” than the minimum wage.

*Id.*

Ultimately, the ALJ concluded that Mr. Goodspeed “is in fact[] working full time” and that he “is voluntarily underemployed for the purpose of reducing his child support obligation.” AR at 13A.

#### **IV. ARGUMENT**

An ALJ’s final order in a proceeding to establish child support is reviewed under the judicial review provisions of the Administrative Procedure Act, chapter 34.05 RCW. RCW 74.20A.055(1); WAC 388-14A-6120(6). Under the APA, the burden of establishing that the order is invalid “is on the party asserting invalidity.” RCW 34.05.570(1)(a). On judicial review, courts generally cannot consider issues that were not raised below or facts that were not made part of the agency record. RCW 34.05.554, .558. “Unchallenged findings of fact are considered verities on appeal.” *Netversant Wireless Sys. v. Dep’t of Labor & Indus.*, 133 Wn. App. 813, 823, 138 P.3d 161 (2006).

Relief from an adjudicative order is only available as described in RCW 34.05.570(3). For the purposes of this appeal, relief is only available if the order (1) involves an erroneous interpretation or application of the law, (2) is not supported by substantial evidence “when viewed in light of

the whole record,” or (3) “is arbitrary or capricious.” RCW 34.05.570(3)(d), (e), (i).

“[L]egal conclusions receive de novo review under the error of law standard.” *Beatty v. Wash. Fish & Wildlife Comm’n*, \_\_ Wn. App. \_\_, 341 P.3d 291, 304 (2015). An order “is supported by substantial evidence if there is ‘a sufficient quantity of evidence to persuade a fair-minded person of the truth or correctness of the order.’” *Hardee v. Dep’t of Soc. & Health Servs.*, 172 Wn.2d 1, 7, 256 P.3d 339 (2011) (quoting *Thurston Cnty. v. W. Wash. Growth Mgmt. Hrgs. Bd.*, 164 Wn.2d 329, 341, 190 P.3d 38 (2008) (internal quotations omitted)). “Agency action is arbitrary and capricious if it is willful and unreasoning and without regard to the facts or circumstances.” *Netversant Wireless Sys.*, 133 Wn. App. at 822.

Because this case is before the Court on review pursuant to the APA, this Court “sits in the same position as the superior court” and “applies the APA standards directly to the administrative record.” *Verizon Northwest v. Wash. Emp’t Sec. Dep’t*, 164 Wn.2d 909, 915, 194 P.3d 255 (2008).

## **V. CONCLUSION**

The Department takes no position on whether this Court should affirm or reverse the ALJ’s order setting Mr. Goodspeed’s child support obligation. The Department provides this response to explain the forum it



provides for private parties to establish child support obligations and to assist the Court in understanding the record and applicable legal standards.

RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of April, 2015.

ROBERT W. FERGUSON  
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A handwritten signature in dark ink, appearing to read 'KS', is written over a horizontal line.

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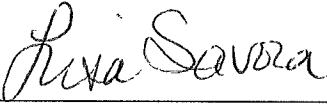
### CERTIFICATE OF SERVICE

I hereby certify that on the date below, I served a copy of the  
RESPONDENT DEPARTMENT OF SOCIAL AND HEALTH  
SERVICE'S BRIEF on the following by email.

Brad M. Goodspeed 2810 W. Washington Ave. Yakima WA 98903	<input checked="" type="checkbox"/> <b>U.S. Mail Postage Prepaid</b> <input type="checkbox"/> ABC/Legal Messenger <input type="checkbox"/> Hand delivered by _____ <input type="checkbox"/> Email:
Olga Rodriguez P.O. Box 222 Coulee Dam WA 99116	<input checked="" type="checkbox"/> <b>U.S. Mail Postage Prepaid</b> <input type="checkbox"/> ABC/Legal Messenger <input type="checkbox"/> Hand delivered By _____ <input type="checkbox"/> Email:
Olga Rodriguez <i>Address known to registry</i>	<input checked="" type="checkbox"/> <b>U.S. Mail Postage Prepaid</b> <input type="checkbox"/> ABC/Legal Messenger <input type="checkbox"/> Hand delivered By _____ <input type="checkbox"/> Email:

I certify under penalty of perjury under the laws of the state of  
Washington that the foregoing is true and correct.

DATED this 6<sup>th</sup> day of April 2015, at Tumwater, Washington.

  
\_\_\_\_\_  
LISA SAVOIA, Legal Assistant

# WASHINGTON STATE ATTORNEY GENERAL

**April 06, 2015 - 2:24 PM**

## Transmittal Letter

Document Uploaded: 4-473569-StateResponseBrief.pdf

Case Name: Goodspeed v State of Washington

Court of Appeals Case Number: 47356-9

**Is this a Personal Restraint Petition?** Yes ☐ No ☒

### The document being Filed is:

Designation of Clerk's Papers

Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: \_\_\_\_\_

Answer/Reply to Motion: \_\_\_\_\_

Brief: \_\_\_\_\_

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: \_\_\_\_\_

Hearing Date(s): \_\_\_\_\_

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

☒ Other: State's Response Brief

### Comments:

No Comments were entered.

Sender Name: Lisa M Savoia - Email: [LisaS6@atg.wa.gov](mailto:LisaS6@atg.wa.gov)

A copy of this document has been emailed to the following addresses:

[LisaS6@atg.wa.gov](mailto:LisaS6@atg.wa.gov)

[karls@atg.wa.gov](mailto:karls@atg.wa.gov)

[cherylcl@atg.wa.gov](mailto:cherylcl@atg.wa.gov)